IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ASENCIO and ALICIA SALAZAR,)
Plaintiffs,)
v.) No. 08 C 387
ARGENT MORTGAGE COMPANY, LLC and DEUTSCHE BANK NATIONAL TRUST COMPANY,)) Judge Kocora)
Defendants.)

DEFENDANTS' (AGREED) MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADINGS TO PLAINTIFFS' COMPLAINT

Defendants Argent Mortgage Company, LLC and Deutsche Bank National Trust Company ("Defendants"), by their attorneys, move, with the agreement of Plaintiffs, for an extension of time to file their responsive pleadings to Plaintiffs' complaint. In support of their motion, Defendants state as follows:

- 1. There is pending in the U.S. District Court for the Northern District of Illinois the MDL litigation, In re Ameriquest Mortgage Co., Mortgage Lending Practices Litigation, MDL Docket No. 1715, Lead Case No. 05 C 7097 (Aspen, J.) ("Ameriquest/Argent MDL Litigation"). The Ameriquest MDL Litigation includes challenges to loans originated by Ameriquest Mortgage Company and Argent Mortgage Company, LLC.
- 2. Coincident with filing Defendants' present motion for extension of time, Defendants are filing Defendants' motion for reassignment of related action, requesting the reassignment of this lawsuit to the Ameriquest/Argent MDL Litigation. Plaintiffs agree to this reassignment. The parties fully expect Judge Aspen to grant Defendants' motion for reassignment. Judge Aspen has reassigned hundreds of other lawsuits to the Ameriquest/Argent MDL Litigation similarly challenging Argent Mortgage Company, LLC-originated loans.

3. Accordingly, Defendants request a 30-day extension of time (after Judge Aspen rules on Defendants' motion for reassignment) to file their responsive pleadings to Plaintiffs' complaint (presumably, within the Ameriquest/Argent MDL Litigation). Plaintiffs agree to this present request.

WHEREFORE, Defendants Argent Mortgage Company, LLC and Deutsche Bank
National Trust Company, respectfully request a 30-day extension of time (after Judge Aspen rules on
Defendants' motion for reassignment), to file their responsive pleadings to Plaintiffs' complaint.

Dated: July 23, 2008

ARGENT MORTGAGE COMPANY, LLC and DEUTSCHE BANK NATIONAL TRUST COMPANY, Defendants

By: s/ Jonathan N. Ledsky
One of their Attorneys

Craig A. Varga Jonathan N. Ledsky Scott J. Helfand Varga Berger Ledsky Hayes & Casey A Professional Corporation 224 South Michigan Avenue - Suite 350 Chicago, Illinois 60604 (312) 341-9400

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Filed 07/23/2008

CERTIFICATE OF SERVICE

I, Jonathan N. Ledsky, an attorney, hereby certify that a true and correct copy of the foregoing Defendants' (Agreed) Motion for Extension of Time to File Responsive Pleadings to Plaintiffs' Complaint was served electronically via CM/ECF e-Filing upon:

Daniel Mark Harris (<u>lawofficedh@yahoo.com</u>)

Anthony P. Valach, Jr. (anthonyvalach@sbcglobal.net)

this 23rd day of July, 2008.

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